# EXHIBIT P

- COMMERCIAL CHEMICAL PRODUCT LINES
- 2. GENERAL TOXICITY
- 3. SULFONIC ACID & CARBOXYLIC ACID DERIVATIVES
  - REVIEW OF SUBCHRONIC DATA
  - METABOLISM DATA
- 4. SUMMARY

#### COMMERCIAL CHEMICALS PRODUCT LINES

"FLUORINERTS"

**ELECTRONIC LIQUIDS** 

"FLUOREL/KEL-F"

ELASTOMERIC RUBBER/PLASTICS

"LIGHT WATER"

AQUEOUS FILM FORMING FOAMS

FIRE FIGHTING LIQUIDS

"SCOTCHGARD, SCOTCHBAN"

TEXTILE/PAPER TREATMENTS

"FLUORAD"

**SURFACTANTS** 

# "FLUORINERT" ELECTRONIC LIQUIDS

PERFLUORINATED CARBON CHAINS

FC-88 PERFLUOROPENTANE  $C_5F_{12}$ 

 $C_6F_{14}$ FC-72 PERFLUOROHEXANE

BLENDS OF PERFLUORINATED CYCLIC ETHERS AND PERFLUORINATED CARBON CHAIN

FC-75 
$$C_8F_{16}O$$
 (cycLic) +  $C_8F_{18}$ 

USES: VAPOR PHASE SOLDERING, QUALITY CONTROL FOR ELECTRONIC PARTS, HEAT TRANSFER FLUIDS, COOLING OF ELECTRONIC COMPONENTS

#### No deaths when animals were exposed exposed to near saturated vapors at room temperature for 2 hours. exposed to near saturated vapors at room temperature for 2 hours. exposed to 15 mg/liter for 4 hours exposed to 250 mg/liter for 1 hour exposed to 750 mg/liter of air for to "near saturated" atmosphere at room temperature. exposed to 3300 mg/liter of air ACUTE INHALATION No deaths when animals were No deaths when animals were exposed to 340 mg/liter of air. No deaths when animals were exposed to 90 mg/liter for 4 hours (300° F). at room temperature. at room temperature. for 3 hours. No Data 4 hours. Minimally irritating **EYE IRRITATION** Non-irritating Non-irritating Non-irritating Non-irritating Non-irritating Non-irritating Non-irritating Non-irritating Non-irritating (Rabbit) Minimally irritating SKIN IRRITATION Non-irritating Non-irritating Non-irritating Non-irritating Non-irritating Non-irritating Non-irritating Non-irritating Non-irritating (Rabbit) ACUTE ORAL TOXICITY 34.6 g/kg (Intraperitoneal) 34.6 g/kg (oral) 34.6 g/kg (oral) 34.6 g/kg (oral) 23.1 g/kg (oral) 34.6 g/kg (oral) 10 g/kg (oral) 10 g/kg (oral) 10 g/kg (oral) 10 g/kg (oral) LD 50 "FLUORINERT" LIQUIDS FC-104 FC-70 FC-75 FC-40 FC-43 FC-48 FC-88 FC-78 FC-72 FC-77

NOTE: All "FLUORINERT" Liquids, except FC-40, are classified as being practically non-toxic orally. FC-40, is classified as being practically non-toxic intraperitoneally.

#### "FLUOREL/KEL-F" ELASTOMERS/THERMOPLASTIC

"FLUOREL" FLUOROELASTOMERS

COPOLYMERS OF

VINYLIDENE FLUORIDE

PERFLUOROPROPENE

$$H = C = C$$

$$F = C$$

$$CF3$$

"KEL-F" THERMOPLASTICS

COPOLYMERS OF

VINYLIDENE FLUORIDE

**CHLOROTRIFLUOROETHYLENE** 

$$H = C = F$$

$$F = C = F$$

USES: "FLUOREL": HEAT RESISTENT

O-RINGS, GASKETS, ETC.

"KEL-F": ACID/BASE RESISTANT THERMOPLASTIC LAQUERS, AND COATINGS

FOR ALUMINUM, COPPER, STEEL & PLASTIC

#### TOXICITY SUMMARY OF

#### "FLUOREL" AND KEL-F" PRODUCTS

# "FLUOREL" ELASTOMER

PRIMARY SKIN IRRITATION (RABBIT):

0.0/8.0 NON-IRRITATING

ACUTE INHALATION, THERMAL DECOMPOSITION:

10/10 DEATHS TOXIC PRODUCTS AT 260°C.

#### "KEL-F" THERMOPLASTIC

ACUTE ORAL TOXICITY (RAT):

>5 GM/KG

PRACTICALLY NON-

PRIMARY SKIN IRRITATION (RABBIT):

0.0/8.0

NON-IRRITATING

EYE IRRITATION (RABBIT):

15.5/110.0 MINIMALLY IRRITATING

#### "LIGHT WATER" AQUEOUS FILM FORMING FOAMS

TYPICAL FORMULATION: FC-203

2-3%	FLUOROCHEMICAL FOAMER*
1-2%	FLUOROCHEMICAL SURFACTANTS
3%	HYDROCARBON SURFACTANTS
2%	SOAP
65%	WATER
25%	BUTYL CARBITOL

\*FLUOROCHEMICAL FOAMER

$$\begin{array}{c} \text{CH}_2\text{CHOHCH}_2\text{SO}_3\text{NA} \\ \text{C}_6\text{F}_{13}\text{SO}_2\text{NC}_3\text{H}_6\text{N} \text{(CH}_3)}_2\text{C}_2\text{H}_4\text{OH} \end{array}$$

†FLUOROCHEMICAL SURFACTANT

USES: FIRE EXTINGUISHING LIQUIDS ESPECIALLY GOOD FOR EXTINGUISHING SOLVENT AND FUEL FIRES

# "LIGHT WATER" AFFF TOXICITY SUMMARY OF PRODUCTS

Acute Oral Toxicity	LD <sub>50</sub> 1.0-3.0 6/KG	LD <sub>50</sub> >5 G/KG	LD <sub>50</sub> >5 G/KG	LD <sub>50</sub> > 5 G/KG		LD <sub>50</sub> >10 в/кв	
EYE IRRITATION	12,7/110 minimally	11.0/110 minimally	6,0*/110 MILDLY	17,1/110 MILDLY	0.0/110.0 non-irritating	9,3+/110,0 moderately	13,6/110.0 MINIMALLY
Primary Skin Irritation	0.0 NON-IRRITATING	0,0 NON-IRRITATING	0.0 NON-IRRITATING	0.1 MINIMALLY IRRITATING	0.0 NON-IRRITATING	,96 SLIGHTLY IRRITATING	0.0 NON-IRRITATING
PRODUCT	FC-201	FC-203A	FC-206	FC-206A	FC-206A DILUTED (6%)	PC-600	FC-600 D1LUTED (6%)

\*IRRITATING THROUGH 5 DAYS +IRRITATING THROUGH 7 DAYS

#### "SCOTCHGARD/SCOTCHBAN" TEXTILE/PAPER TREATMENTS

"SCOTCHGARD" TEXTILE TREATMENTS

FLUOROCHEMICAL EMULSIONS

FC-234:

30% Solids Terpolymer: METHYL FOSE ACRYLATE/

BUTYL ALCOHOL/

POLY MEG 2000 DIMETHYL ACRYLATE

IN: WATER

METHYL ISOBUTYL KETONE

ETHYLENE GLYCOL

FC-378:

30% Solids 2 ET

FOSE+/TDI:

**URETHANE** 

IN: WATER

METHYL ISOBUTYL KETONE

ETHYLENE GLYCOL

\*MEFOSE ACRYLATE:

 $C_8F_{17}SO_2N(CH_3)C_2H_4O^{-1}C_4CH_2$ 

+ETFOSE:

 $C_8F_{17}SO_2N(C_2H_3)C_2H_4OH$ 

USES: Provides soil, stain and water repellancy to a variety of fabrics.

# "SCOTCHBAN" PAPER TREATMENTS

FC-807: 33% SOLID SALT OF A FLUOROCHEMICAL PHOSPHATE ESTER

$$\mathbb{C}_{8}$$
F<sub>17</sub>SO<sub>2</sub>N(C<sub>2</sub>H<sub>3</sub>)CH<sub>2</sub>CH<sub>2</sub>O 2 P ONH<sub>4</sub>

IN WATER AND ISOPROPYL ALCOHOL

USES: OIL AND STAIN RESISTANCE IN PAPER PRODUCTS. FC-807 IS CURRENTLY APPROVED BY THE U.S. FOOD AND DRUG ADMINISTRATION FOR USE IN FOOD PACKAGING.

"SCOTCHGARD/SCOTCHBAN" TOXICITY SUMMARY					Sub-		
SCOTCHGARD	<u>PS I</u>	GPS HSP*	<u>EI</u>	LD <sub>50</sub> AOT	<u>I.T.</u>	Ames	CHRONIC DATA
FC-214	0.0	NEG.	0.0	>5g/кg	Low hazard	N.K.	No
FC-234	0.0	N.K.	47.31 MODERATELY	>5g/кg	N.K.	N.K.	No
FC-380	0.0	NEG.	8.0 MINIMALLY	>10g/кg	Low Hazard	Neg.	No
FC-388	0.0	NEG.	15.3 MILDLY	>5g/кg	Low hazard	Neg.	No
<u>SCOTCHBAN</u>							
FC-807	0.0	NEG.	<15.0 MINIMALLY	>15.4g/кg	N.K.	Neg.	YES
FC-808	<1.6 MINI- MALLY	N.K.	4.0 MINIMALLY	>15g/кg	N.K.	Neg.	Yes

<sup>\*</sup>Guinea Pig Sensitization Human Skin Patch Study

# "FLUORAD" SURFACTANTS

#### PERFLUOROOCTYL SULFONIC ACID DERIVATIVES

FC-95: C<sub>8</sub>F<sub>17</sub>SO<sub>3</sub> K

FC-99:  $C_8F_{17}SO_3H_2N^+(CH_2CH_2OH)_2$ 

FC-128:  $C_8F_{17}SO_2NH(CH_2)_3N(CH_3)_3^+I'$ 

#### CARBOXYLIC ACID DERIVATIVE

 $FC-143: C_7F_{13}COO'NH_4^+$ 

USES: REDUCE SURFACE TENSION OF AQUEOUS AND NON-AQUEOUS ETCHING BATHS, SPECIALTY INKS, FLOOR POLISH EMULSIONS AND PHOTOGRAPHIC SOLUTIONS, TEFLON EMULS IF IER.

FLUORAD SURFACTANT TOXICITY SUMMARY

SUBCHRONIC	Yes	Yes - 14 DAY SUBACUTE	ON N	No	Yes
AMES	NEGATIVE	х 	3 N.K.	× /	. NEGATIVE
1.T.	LC <sub>50</sub> 5.2mg/L	N.K.	LC <sub>50</sub> 22.22-6623 N.K. mG/L	LD <sub>50</sub> >5.1mg/L respiratory irritant	LC <sub>50</sub> >18.6mg/L respiratory irritant
A.0.T.	LD <sub>50</sub> 251mg/kg	LD <sub>50</sub> > 56/кв	LD <sub>50</sub> 1250мG/кG slightLY	LD <sub>50</sub> 500mg/kg moderately toxic	Ш50 540м6/кв
<u>ا</u>	9.3 MILDLY	15.2 MILDLY	5,8 MINIMALLY	7.0 Minimally	14.0 minimally
P.S.I.	0.0 Non-irritating	O.1 MINIMALLY	0,9 slightly	0,5 MINIMALLY	0.0 Non-irritating
	FC-95	FC-99	FC-128	FC-134	FC-143

# MANUFACTURE OF FC-143 CARBOXYLIC ACID DERIVATIVE

100% PERFLUOROOCTANOIC ACID

FC-143

#### MANUFACTURE OF ETFOSE ALCOHOL AND FC-95

FC-95

MANUFACTURE OF FC-807

$$C_2H_5$$
 $C_8F_{17}SO_2NC_2H_4OH + POCL_3$ 
 $FM-3422$ 
 $5-15\%$   $R-0-P-CL_2$ 
 $65-75\%$   $(R)_2-P-CL$   $(R)_3-P$   $15-25\%$ 
 $R_2-P-OH$   $R_3-P=0$ 
 $R_2-P-OH$   $R_3-P=0$ 
 $R_2-P-ONH_4$ 
 $R_3-P=0$ 
 $R_3-P=0$ 

FC-807

80-90% DIESTER

# PRODUCT LINES BASED ON

#### PERFLUOROOCTYL SULFONYL ACID DERIVATIVES

"FLUORAD" SURFACTANTS	27
"SCOTCHGARD" FABRIC AND TEXTILE TREATMENTS	58
"SCOTCHBAN" Paper Treatments	10
"LIGHTWATER" Aqueous Film Forming Foams (C6 Sulfonyl Acid Derivatives)	10

# CHRONOLOGY OF EVENTS LEADING TO THE INITIATION OF 90 DAY STUDIES

- 1971 D. R. TAVES REPORTS ORGANIC AND INORGANIC FORMS OF FLUORINE IN HUMAN SERUM.
- TAVES PRESENTS 19 F NMR SPECTRA DATA TO 3M 1975 CRL IDENTIFIES 19 NMR SPECTRUM AS C8F17SO3H OR ITS SALTS
- 1976 ANALYTICAL METHOD FOR LOW LEVEL DETECTION OF R+F' DEVELOPED

3M WORKERS SAMPLED

CARBOXYLIC ACID IDENTIFIED IN 3M EMPLOYEE C7F15C00'H+

Analysis of R+F' LEVELS IN SHORT-TERM ANIMAL 1977 STUDIES BEGINS

90 DAY STUDIES ON FC-143, FC-95 AND FM-3422 INITIATED

# 90 DAY ORAL STUDY, FC-143, RAT

Dose	DEATHS	PHARMACOTOXIC SIGNS AND PATHOLOGY
10ррм	0/10	No remarkable pathology
30ррм	0/10	IN MALES: INCREASED LIVER AND KIDNEY WEIGHTS
100ррм	1/10*	In males: Increased kidney weights
300ррм	1/10*	IN MALES: INCREASED LIVER AND KIDNEY WEIGHTS, SOME LIVER PATHOLOGY
1000ррм	0/10	IN MALES: LIVER DISCOLORATION WITH SLIGHT HYPERTROPHY OF THE HEPATOCYTES. BLOOD EFFECTS.

<sup>\*</sup>RATS DIED AFTER BLOOD COLLECTION.

# 90 DAY ORAL STUDY, FC-143, RHESUS MONKEY

DOSE	DEATHS	PHARMACOTOXIC SIGNS, PATHOLOGY
3 MG/KG/DAY	0/4	SOFT STOOL, OCCASIONAL EMESIS. INCREASED PLATELET COUNT
10 mg/kg/day	0/4	Anorexia, pale face & gums Increase in activated partial prothrombin time (APPT)
30 mg/kg/day	3/4	Same as above, swollen face and eyes Decreased activity prostration Death 7-12 weeks Highly increased APPT. Pathology revealed hemopoetic effect
100 mg/kg/day	4/4	Same as above. Death 2-5 weeks.

# 90 DAY ORAL STUDIES FC-95, RAT

Dose	DEATH	PHARMACOTOXIC SIGNS & PATHOLOGY
30ррм	0/10	No significant pharmacotoxic signs.
		PATHOLOGY REVEALED SOME MINOR LIVER EFFECTS.
100004	5/10	INCREACED CENCITIVITY TO EXTERNAL OTHER
100ррм	5/10	INCREASED SENSITIVITY TO EXTERNAL STIMULI.
		Consulsions, CNS effects.
		LIVER NECROSIS, GI TRACT HEMORRHAGING. HEMATOPOETIC EFFECT: THYMUS, SPLEEN AND MESENTARY LYMPH NODES.
300ррм	10/10	INCREASED SENSITIVITY TO EXTERNAL STIMULI.
		EMACIATION, CONVULSIONS.
		Hunched Back.
		Pathology same as 100ppm
1000ррм	10/10	SAME AS ABOVE.
TOUUPPM	10/10	SAME WE VROAF!
3000ррм	10/10	CAME AC ADOVE DEDUCED MOTOR ACTIVITY
JUUUPPM	10/10	SAME AS ABOVE, REDUCED MOTOR ACTIVITY.

# 90 DAY ORAL RHESUS MONKEY STUDY FC-95 I.

<u>Dose</u> 10mg/kg/day	<u>Death</u> 4/4 (11-20 day)	PHARMACOTOXIC SIGNS & PATHOLOGY ANOREXIA, SLIGHT TO SEVERE DECREASES IN ACTIVITY, EMESIS. BODY TREMORS, TWITCHING, CON-		
		VULSIONS AND PROSTRATION.  LIVER DISCOLORATION NOTED BUT  NO HISTOPATHOLOGICAL EVIDENCE  OF DAMAGE.		
30mg/kg/day	4/4 (7-10 DAY)	SAME AS ABOVE.		
100mg/kg/day	4/4 (3-5 DAY)	Same as above.		
300mg/kg/day	4/4 (2-4 DAY)	SAME AS ABOVE.		

#### II. 90 DAY ORAL RHESUS MONKEY TOXICITY STUDY

Dose	<u>Death</u>	PHARMACOTOXIC SIGNS & PATHOLOGY
0.5mg/kg.day	0/4	GI TRACT TOXICITY. LIPID DEPLETION OF ADRENALS, ATROPHY OF PANCREATIC EXOCRINE CELLS AND SEROUS ALVEOLAR CELLS OF THE SALIVARY GLANDS.
1.5mg/kg/day	0/4	GI TRACT TOXICITY. SAME AS ABOVE.
4.5MG/KG/DAY	4/4 (5-7 WEEK)	GI TRACT TOXICITY. SEVERE RIGIDITY, CONVULSIONS, BODY TREMORS, PROSTRATION, AND WEIGHT LOSS.

# 90 DAY RAT FM 3422

Dose	DEATH	PHARMACOTOXIC SIGNS & PATHOLOGY
30ррм	0/10	
100ррм	0/10	IN MALES: INCREASED LIVER AND KIDNEY WEIGHT.
300ррм	2/10*	Increased liver and kidney weights.  Liver and kidney discoloration,  Liver: hypertrophy and necrosis,  Kidney: Tubular nephrosis.
1000ррм	10/10	INCREASED SENSITIVITY TO EXTERNAL STIMULI. EMACIATION, HUNCHED BACK, CONVULSIONS. SAME AS ABOVE.
3000ррм	10/10	SAME AS ABOVE.
10,000ррм	10/10	SAME AS ABOVE.

<sup>\*</sup>DIED AFTER BLOOD COLLECTION.

# 90 DAY ORAL RHESUS MONKEY STUDY FM 3422

Dose	DEATH	PHARMACOTOXIC SIGNS & PATHOLOGY
1mg/kg/day	0/4	DIARRHEA, NO REMARKABLE GROSS OR HISTOPATHOLOGY.
3mg/kg/day	0/4	DIARRHEA, NO REMARKABLE GROSS OR HISTOPATHOLOGY.
10mg/kg/day	0/4	DIARRHEA, IN MALES INCREASE LIVER WEIGHT. NO HISTOPATHOLOGY.
30mg/kg/day	1/4	BLOODY MUCOUS IN STOOL, EMESIS, DIARRHEA. IN MALES INCREASED LIVER WEIGHT. LIPID DEPLETION OF ADRENALS. MODERATE ATROPHY OF PANCREATIC EXOCRINE CELLS.

#### COMPARISON OF THE SUBACUTE DATA

- 1. FC-95 is the most toxic of the three compounds. FOLLOWED BY FM-3422 AND FC-143
- 2. IN GENERAL MALE RATS WERE MORE SENSITIVE TO THE COMPOUNDS THAN FEMALE RATS.
- 3. No apparent sex differences were noted with monkeys.
- THE TARGET ORGANS IN RATS WERE THE LIVER, KIDNEY, CENTRAL NERVOUS 4. SYSTEM (CNS), GI TRACT, AND RETICULOENDOTHELIAL SYSTEM. IN MONKEYS THE LIVER AND KIDNEY EFFECTS WERE ABSENT. GI TRACT DISTURBANCES, RETICULOENDOTHELIAL SYSTEM AND CNS TOXICITY WERE EVIDENT.
- 5. MONKEYS WERE GENERALLY MORE SENSITIVE TO THE FLUOROCHEMICAL TOXICITY THAN RATS. 10 PPM IN DIET ~/MG/KG/DAY

	RAT	Monkey	
FC-143	0/10 a 100 mg/kg/day	3/4 30 mg/kg/day	
FC-95	5/10 <b>a</b> 10 mg/kg/day	4/4 4.5 MG/KG/DAY	
FM-3422	10/10 a 100 mg/kg/day	1/4 30 mg/kg/day	

# METABOLISM STUDIES POSITION OF CARBON-14 LABEL

# ORAL ABSORPTION OF 14 C LABELLED FLUOROCHEMICALS

FC-807

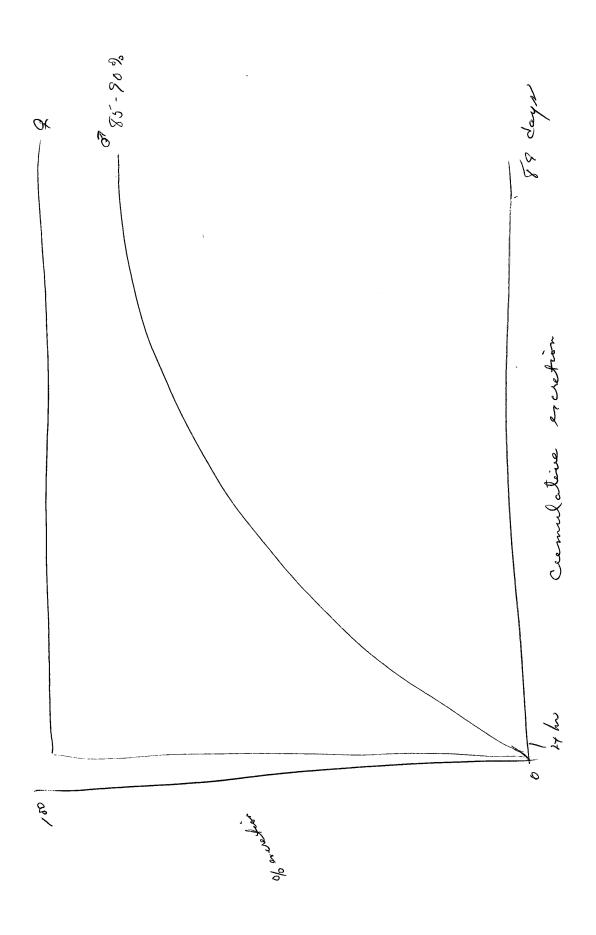
≤ 5%

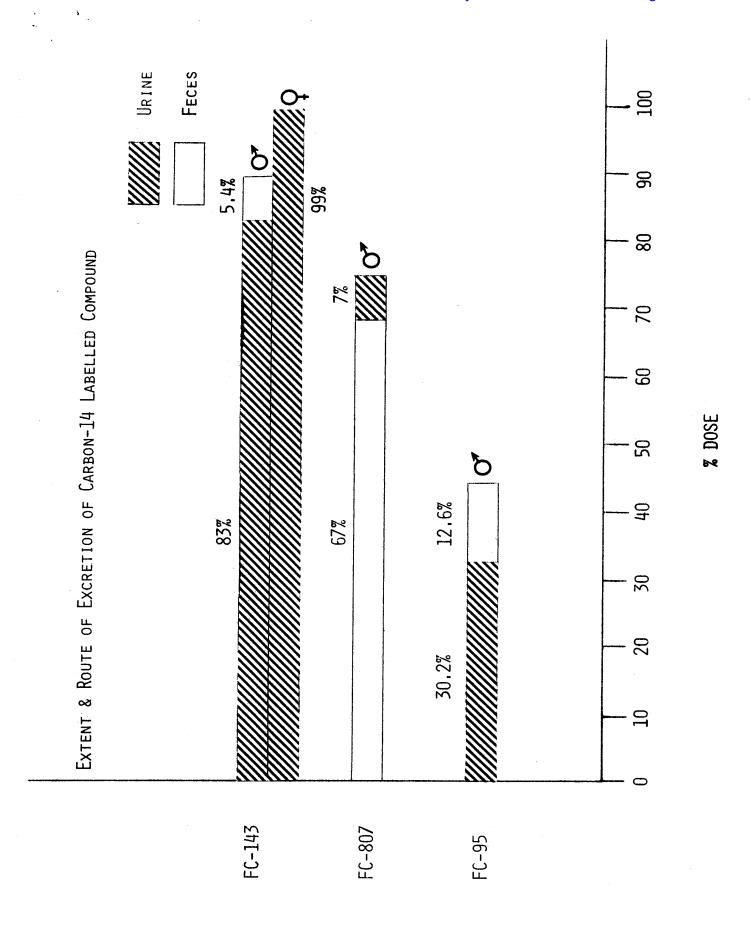
FC-95

~95%

FC-143

**~93%** 





# TISSUE DISTRIBUTION OF 14 C LABELLED FLUOROCHEMICALS

		FC -143	FC-95	FC-807
		% OF DOSE	µG/G TISSUE	₽G/G TISSUE
1.	LIVER	2.5%	20.6	31
2.	SPLEEN	<0.5%	0.5	277
3.	PLASMA	1.1%	2.2	1.5
4.	BONE MARROW	<0.5%	0.5	73
5.	Kidney	<0.5%	1.1	1.7
6.	ADRENALS	<0.5%	<0.5	3.9
7.	RBC	<0.5%	N.R.	1.2
8.	Еуе	<0.5%	0.5	0.2
9.	Lung	<0.5%	1.1	N.R.

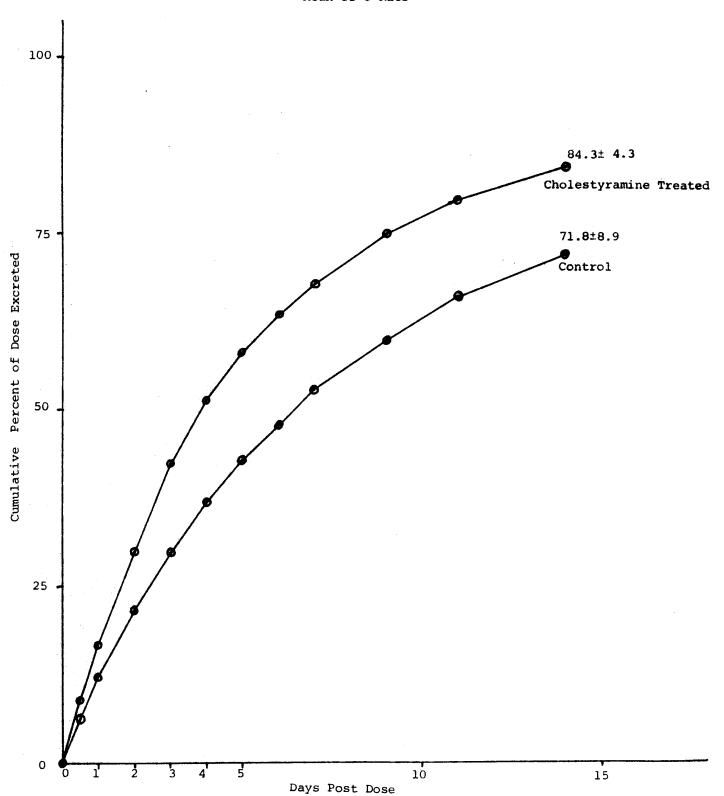
Cumulative Percent of Dose Excreted  $\overset{\circ}{\circ}$ 

75

0

Cumulative Excretion (Urine + Feces) of Total Carbon-14 After a Single Intravenous Dose of FC-143-1C (Mean Dose of FC-143-1C: Cholestyramine Treated, 13.3 mg/kg; Control, 13.5 mg/kg)

Mean of 5 Rats



#### WHAT HAVE THE ANIMAL STUDIES ON FC-95 AND FC-143 SHOWN?

- 1. FC-95 APPEARS TO BE THE MOST TOXIC OF THE COMPOUNDS EXAMINED.
- 2. FC-143 APPEARS TO BE THE LEAST TOXIC.
- 3. BOTH ARE WELL ABSORBED FROM THE GI TRACT.
- 4. FC-143 APPEARS TO BE QUICKLY ELIMINATED.
- 5. FC-95 is slowly eliminated.
- 6. BOTH COMPOUNDS APPEAR TO HAVE EFFECTS ON THE HEMOPOETIC SYSTEM AND GI TRACT. THE LIVER AND KIDNEY EFFECTS PRESENT IN RODENTS ARE ABSENT IN PRIMATES.
- 7. MALE RATS ARE MORE SENSITIVE THAN FEMALE RATS.
- 8. PRIMATES ARE MORE SENSITIVE THAN RATS.
- 9. CHOLESTYRAMINE ADMINISTRATION MAY BE A POSSIBLE WAY TO ELIMINATE FC IN THE BLOOD OF WORKERS.

#### OTHER ANIMAL TOXICITY STUDIES IN PROGRESS

- SURFACTANT SKIN ABSORPTION STUDY: CONTRASTING SOLID AND LIQUID FORMS OF THE SURFACTANTS
- 2. TERATOLOGY STUDY ON FC-95 AND FM-3422
- 3. FURTHER INVESTIGATION PLATELET AGGREGATION AND APTT.